



1 in Debtor's Business ("Motion") pursuant to 11 U.S.C.S. §§554(b) and 721 of the Bankruptcy Code  
2 and Federal Rule of Bankruptcy Procedure 6007(b).

3 By this motion Debtor requests that the Court enter an order compelling the Chapter 7  
4 Trustee to abandon the bankruptcy estate's interest in Debtor's business on the following grounds:

- 5 1. Debtor's business does not possess or own any assets that might be liquidated for  
6 value to benefit creditors and is therefore of inconsequential benefit to the estate,  
7 and;
- 8 2. The retention and operation of the business by the Trustee would be burdensome  
9 and costly to the estate and the creditors thereof.

10 Said grounds will be supported by this notice of motion, by the motion filed herewith, by the  
11 pleadings and papers on file in this bankruptcy case, memorandum of points and authorities herein,  
12 declaration in support of this motion and exhibits, if any, filed herewith, and by such oral and  
13 documentary evidence as the Court may permit upon the hearing of this motion.

14  
15 Dated: October 6, 2011

/s/ Richard Allaye Chan Jr.  
Richard Allaye Chan Jr.  
Attorney for Debtor